Michael T. Sullivan

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Attorneys for Zeichner Ellman & Krause LLP

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

Debtor.

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In re : Case No. 19-13895-jlg

:

Orly Genger, : Chapter 7

: STIPULATION AND [PROPOSED]

ORDER EXTENDING TIME TO RESPOND TO DEPOSITION

SUBPOENA

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WHEREAS, Sagi Genger ("Sagi") served a "Subpoena to Testify at a Deposition in a Bankruptcy Case (or Adversary Proceeding)," dated March 2, 2020 (the "Subpoena") on Zeichner Ellman & Krause LLP ("ZEK");

WHEREAS, with Order of March 26, 2020, the Court extended the time for ZEK to respond to the Subpoena to May 16, 2020;

WHEREAS, at the status conference of May 5, 2020, the Court set another status conference for May 22, 2020 and directed that all litigation be stayed until such conference; and

WHEREAS, ZEK requested and Sagi agreed to extend the time for ZEK to respond to the Subpoena until a week after the May 22, 2020 status conference;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel as follows:

1. The time for ZEK to respond to the Subpoena is extended to May 29, 2020;

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- 2. Each of Sagi and ZEK reserves and does not waive any claim or defense relating to the Subpoena; and
- 3. This stipulation may be executed in counterparts and with facsimile or electronic signature which shall have the same binding effect on the parties hereto as an original signature.

Dated: New York, New York

May 12, 2020

EMMET, MARVIN & MARTIN, LLP

By: /s/John Dellaportas

John Dellaportas, Esq.

Thomas A. Pitta, Esq.

120 Broadway, 32nd Floor New York, New York 10271 (212) 238-3092 jdellaportas@emmetmarvin.com

Attorneys for Sagi Genger

So ordered:

Dated: New York, New York

May 12, 2020

SULLIVAN & WORCESTER LLP

By: /s/ Michael T. Sullivan
Michael T. Sullivan, Esq.

1633 Broadway, 32nd Floor New York, New York 10019 (212) 660-3000 msullivan@sullivanlaw.com

Attorneys for Zeichner Ellman & Krause LLP